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OCT 10 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

Joseph Eugene Pivo
1853 Indian Bend Drive
Henderson, Nevada 89074
702-756-8902
viceroyuncci@gmail.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Joseph Eugene Pivo, Sui juris, Individually and
as Beneficiary of Vice Roy United Nations Credit
and Commerce International Blind Trust
1853 Indian Bend Drive
Henderson, Nevada 89074
APN:178-17-911-009

Plaintiffs,
vs.

No. 2:13-CV-01922-APG-GWF

ROBERT STONE;
RONALD A. COLQUITT;
MICHELLE WILSON;
ANTONIETA TOVAR-GUZMAN;
SHAUNA S. BRENNAN;
CBSK FINANCIAL GROUP, INC.;
CHICAGO TITLE;
MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.; A/K/A MERS;
MERSCORP HOLDINGS, INC.; A/K/A
MERSCORP, INC.;
U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, SUCCESSOR IN INTEREST TO
BANK OF AMERICA, NATIONAL
ASSOCIATION AS SUCCESSOR BY MERGER
TO LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
CERTIFICATEHOLDERS OF BEAR STERNS
ASSET BACKED SECURITIES I LLC, ASSET
BACKED CERTIFICATES, SERIES 2006-HE8;
Does 1-100 inclusive;

Defendants.

**SECOND REQUEST TO ENTER
DEFAULT AGAINST DEFENDANT
RONALD A. COLQUITT**

1 TO THE CLERK OF THE COURT:

2 Second Request to enter Default against Defendant RONALD A. COLQUITT as provided by Fed.
3 R. Civ. P. 55(a) as he failed to plead or otherwise defend pursuant to Fed. R. Civ. P.
4 12(a)(1)(A)(i). In support of this request, please see affidavit/proof of service Doc 94.
5

6 Declaration of Joseph Eugene Piovo, Pursuant to 28 U.S.C. § 1746.

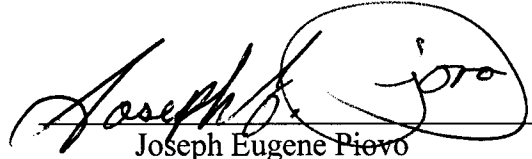
7 Comes now Joseph Eugene Piovo Plaintiff, and pursuant to 28 U.S.C. 1746 hereby declares as
8 follows:

- 9 1. On August 11, 2014, Defendant RONALD A. COLQUITT was personally served at his
10 law office where he agreed to accept service of process located at 321 S. Casino Center,
11 Las Vegas, NV 89101 with the Summons and Complaint. The return of service was filed
12 with the court on August 29, 2014, Doc 107.
- 13 2. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Defendant was required to serve an answer or
14 otherwise plead by September 1, 2014 and failed to do so.
- 15 3. Rule 55(a) provides as follows:
16 (a) Entering a Default.
17 “When a party against whom a judgment for affirmative relief is sought has failed
18 to plead or otherwise defend, and that failure is shown by affidavit or otherwise,
19 the clerk must enter the party’s default.”
20
- 21 4. On September 2, 2014, Defendant RONALD A. COLQUITT filed Motion to Quash
22 Service (Doc 108) and Motion to Dismiss Complaint (Doc 109).
- 23 5. On September 3, 2014, Plaintiff filed Motion to Enter Clerk’s Default against Defendant
24 RONALD A. COLQUITT. (Doc 112)
- 25 6. Plaintiff timely filed its opposition to the motion and the motion was heard on October 3,
26 2014. Magistrate George Foley entered an Order on October 3, 2014 denying the motion to
27
28

1 Quash (Doc 108) and Motion to Dismiss (Doc 109) and declaring that Defendant
2 RONALD A. COLQUITT was properly served before the time for service expired. (Doc
3 108).
4

5 I declare under penalty of perjury that the foregoing is true and correct.
6

7 Dated: October 10, 2014
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9 Joseph Eugene Pievo
10 1853 Indian Bend Drive
11 Henderson, Nevada 89074
12 702-756-8902
13 viceroyuncci@gmail.com
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